

EXHIBIT A

December 27, 2016

By E-mail

Andrew J. DeFilippis, Esq.
Brendan F. Quigley, Esq.
Negar Tekeei, Esq.
Assistant United States Attorneys
United States Attorney Office
Southern District of New York
One St. Andrew's Plaza
New York, New York 10007

Re: United States v. Ahmed Mohammed El Gammal, a/k/a "Jammie Gammal,"
15 Cr. 588 (ER)

Dear Counsel:

Pursuant to Rule 16(a)(1)(G) of the Federal Rules of Criminal Procedure, Mr. El Gammal provides the following information regarding anticipated expert witness testimony.

I. Prof. Andrew March

We intend to call Andrew March an expert witness in militant jihadist groups, including the Islamic State of Iraq and the Levant ("ISIL"). Mr. March was previously qualified as an expert on militant jihadist groups in *United States v. Mehanna*, 09 Cr. 10017 (GAO).

Mr. March is an associate professor (Adjunct) of Law at Yale Law School. His detailed biography is available at www.law.yale.edu. His curriculum vitae is attached here. He was also appointed Adjunct Professor of Law at NYU Law to teach Islamic Law.

<https://its.law.nyu.edu/facultyprofiles/index.cfm?fuseaction=profile.overview&personid=44591>

Mr. March will be called to testify as an expert in the global jihadist movements and the designated foreign terrorist organization, ISIL as well as the Muslim Brotherhood. In particular, he is expected to testify about the principals and customs of Islam, The history, structure, strategic goals, geographic location, and methods and means, including current and historical sources and influences on ISIL's ideology as well the ideology of the Muslim Brotherhood. In addition, Mr. March will testify about the meaning of certain jargon used by Samy El Goarany including the terms "daesh," "the State," "caliphate," "Sham," and "mujahedeen."

Mr. March may be asked to testify about certain physical evidence the Government will offer at trial, including videos from Samy El Goarany's Facebook page as well as Mr. El

Andrew J. DeFilippis, Esq.
Brendan F. Quigley, Esq.
Negar Tekeei, Esq.
Assistant United States Attorneys

December 27, 2016
Page 2

Re: United States v. Ahmed Mohammed El Gammal, a/k/a "Jammie Gammal,"
15 Cr. 588 (ER)

Gammal's Facebook so as to explain the significance of those materials and the phrases, images, and symbols contained therein.

Mr. March's experience in this field and his academic writings on these subjects, as extensively detailed in his curriculum vitae, will serve as the bases for his testimony and opinions.

II. Arabic Language

In addition, we expect to elicit testimony from Marwan Abdel Rahman regarding English translations of certain Arabic-language materials, including electronic communications, social media content, documents, e-mails, and recordings, as well as certain aspects of Arabic vernacular, slang terminology, and idioms used in those materials. Mr. Abdel Rahman is a court certified Arabic interpreter and we are in the process of getting his resume for you from Ms. Paula Gold.

Sincerely,

/s/
Habib/Miron/Shroff
Counsel for Ahmed Mohammed El Gammal